

Message

---

**From:** Stahmann, Eric [eric.stahmann@walgreens.com]  
**Sent:** 7/15/2017 8:06:34 AM  
**To:** Patel-Kar, Jalpa [jalpa.patelkar@walgreens.com]  
**CC:** Daugherty, Patricia [patricia.daugherty@walgreens.com]; Polster, Natasha [tasha.polster@walgreens.com]  
**Subject:** RE: National TD GFD policy power point  
**Attachments:** GFD Training.pptx; Pharmacist Coaching Opportunities V2.pptx

Hi Jalpa,

I'm not sure if you have this already but attached is the national TD GFD training deck and a supplemental GFD coaching opportunities deck. I have also put together various custom decks for HCSs in my area per their request. If the attached decks don't fulfill your needs let feel free to reach out to me directly.

Thanks!

Eric Stahmann MS, LPC, CPhT  
Manager | Pharmaceutical Integrity | Western Operation  
Walgreens Co. | 200 Wilmot Road | MS#2189  
Deerfield, IL 60015  
Office#: (847) 315-2688  
Cell#: (847) 274-5674  
Fax#: (847) 368-6349

---

**From:** Polster, Natasha  
**Sent:** Saturday, July 15, 2017 6:44 AM  
**To:** Patel-Kar, Jalpa <jalpa.patelkar@walgreens.com>  
**Cc:** Daugherty, Patricia <patricia.daugherty@walgreens.com>; Stahmann, Eric <eric.stahmann@walgreens.com>  
**Subject:** RE: National TD GFD policy power point

+ Patty, Eric

See below. Do either of you have one?

---

**From:** Patel-Kar, Jalpa  
**Sent:** Saturday, July 15, 2017 3:10 AM  
**To:** Polster, Natasha <tasha.polster@walgreens.com>  
**Subject:** National TD GFD policy power point

Tasha,

Would you happen to have a more updated deck on TD GFD policy and procedures? I am working with my DPR, Erin to level set expectations of GDF fills in our area. I would appreciate any updated information you can share with me to present for my Area.

Thank you and have a wonderful weeked!

Jalpa Patel-Kar, PharmD  
Area 23 Health Care Supervisor

PLAINTIFFS TRIAL  
EXHIBIT  
**P-19616\_00001**

**Walgreen Co.** | 5330 E. Washington St., Ste. D-105 Phoenix, AZ 85034  
Telephone 602 732 3384 | Mobile 602 245 5947

**Member of Walgreens Boots Alliance**

This email message, including attachments, is the property of Walgreen Co. or its affiliates. It is intended solely for the individuals or entities to which it is addressed. This message may contain information that is proprietary, confidential and subject to attorney-client privilege. If you are not the intended recipient, please immediately notify the sender and delete this message from your system. Any viewing, copying, publishing, disclosure, distribution of this information, or the taking of any action in reliance on the contents of this message by unintended recipients is strictly prohibited.

**This is a hidden slide. It contains preparation information for the presenter.**



©2015 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

WAGMDL00256673



# Good Faith Dispensing Training

## RX Integrity



©2015 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

WAGMDL00256674

P-19616 \_ 00

# Agenda



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

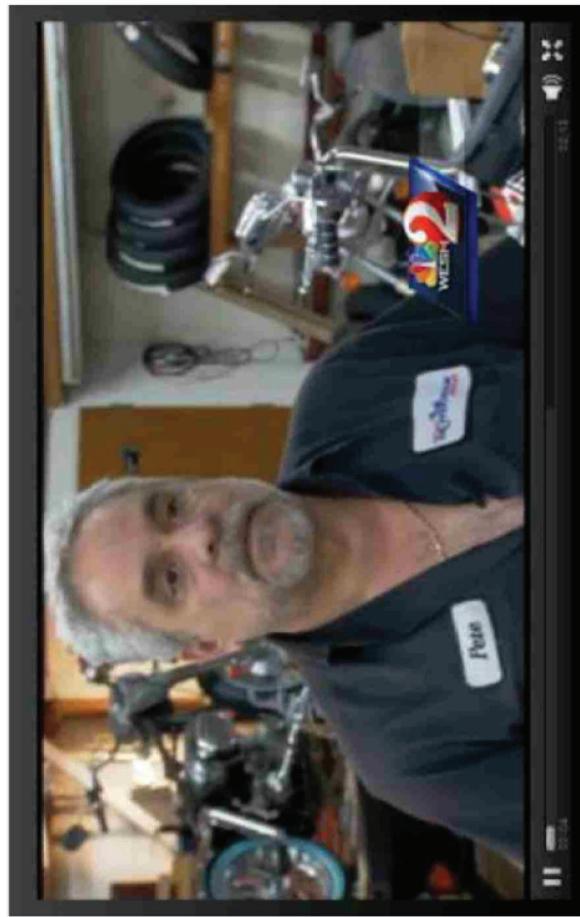
HIGHLY CONFIDENTIAL

## Video Clip

### Pharmacists make us feel like drug addicts

Interview: Pharmacists make us feel like 'drug addicts'

UPDATED: 6:18 PM EST Jan 29, 2015



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

## Video Clip

### Patient says she needs prescription filled in order to function

Patient says she needs prescription filled in order to function

UPDATED 2:15 PM EST Jan 29 2015



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

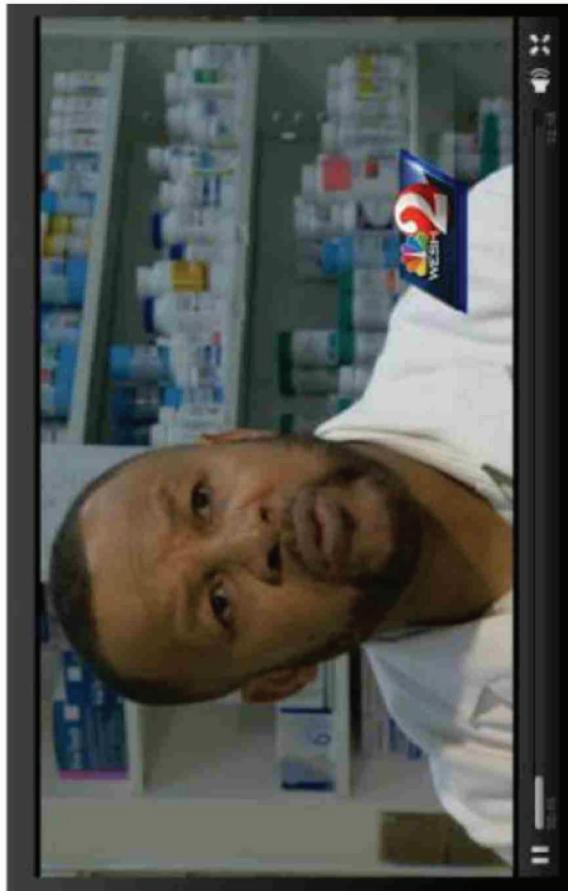
HIGHLY CONFIDENTIAL

## Video Clip

### Pharmacist: says pain killer restrictions can be deadly for patients

Pharmacist: Pain killer restrictions can be deadly for patients

UPDATED 2:10 PM EST Jan 29, 2015



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

**Redacted – Attorney Client Privileged**

HIGHLY CONFIDENTIAL

WAGMDL00256679

**Redacted – Attorney Client Privileged**

©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

**HIGHLY CONFIDENTIAL**

WAGMDL00256680

**Redacted – Attorney Client Privileged**

©2020 DLA Piper. All rights reserved. Confidential and proprietary. Do not distribute.

HIGHLY CONFIDENTIAL

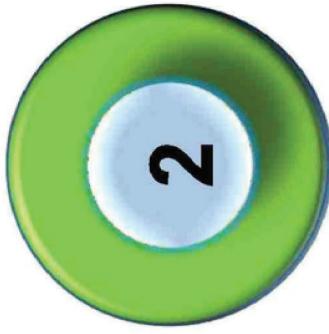
WAGMDL00256681

# Company Expectations



## Red Flags: Prescriptions, Patients, Prescribers

- In your groups, make a list of red flags that may indicate a prescription is not legitimate:
  - Group 1: Prescriptions
  - Group 2: Patients
  - Group 3: Prescribers
- You have 2 minutes
- At the end of the 2 minutes, be prepared to share your list.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

WAGMDL00256682

P-19616\_00

# Company Expectations



## Red Flags: Prescriptions

- Large quantities on prescriptions or large number of controlled substance prescriptions
- Highly abused prescriptions for “cocktails” (opiate, benzodiazepine, and muscle relaxant combo)
- Therapeutic duplication of two or more long-acting or short-acting opiates
- Early refills
- Handwritten prescription that appears altered
- Prescription was refused at another pharmacy
- Prescription is written for someone other than the person presenting the prescription and the person is not the caregiver



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

# Company Expectations



## Red Flags: Patients

- Patients travel in groups or live at the same address
- Patient shows physical signs associated with abuse
- Patient statements and conduct suggest abuse
- Patient has received controlled substance prescriptions from multiple prescribers
- Patient fills controlled substance prescriptions at multiple pharmacies
- Patient only wants controlled substance prescriptions filled
- Patient presents prescriptions for highly abused medications
- Patient is diverting or selling all or part of his/her medications or obtaining drugs from others.



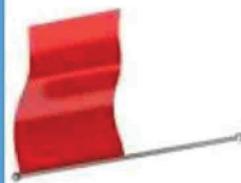
©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

WAGMDL00256684

P-19616\_00

# Company Expectations



## Red Flags: Prescribers

- Prescriber's DEA registration or state license has been previously revoked or suspended or is pending suspension or revocation
- Prescriber's DEA registration or state license has expired, is suspended or revoked
- Prescriber is writing prescriptions outside the scope of his/her practice as defined by state law
- Prescriber/Pain Clinic that takes cash only
- Prescriber is unwilling to discuss treatment plan or answer any questions
- Prescriber's office is located a unreasonably long distance from the patient's home or place of work and/or from the pharmacy



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

## Company Expectations



“Any pharmacist who fails to meet his/her “corresponding responsibility” obligation when dispensing a prescription for a controlled substance, or does not follow the validation procedures outlined below, is subject to disciplinary action up to and including termination of employment.”

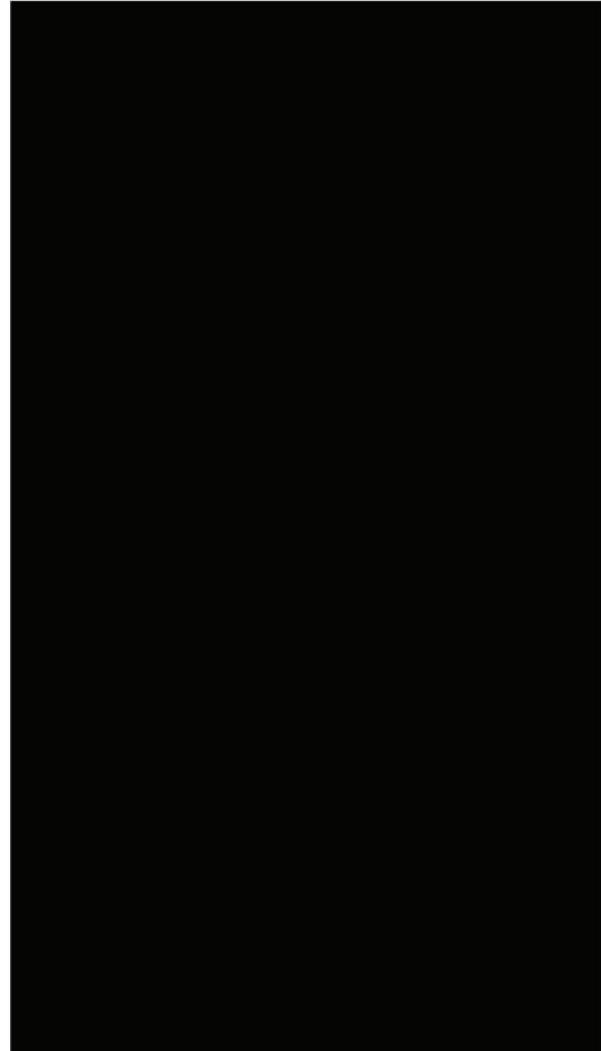
Controlled Substance Prescriptions and Good Faith Dispensing Policy



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

# Video Training 1



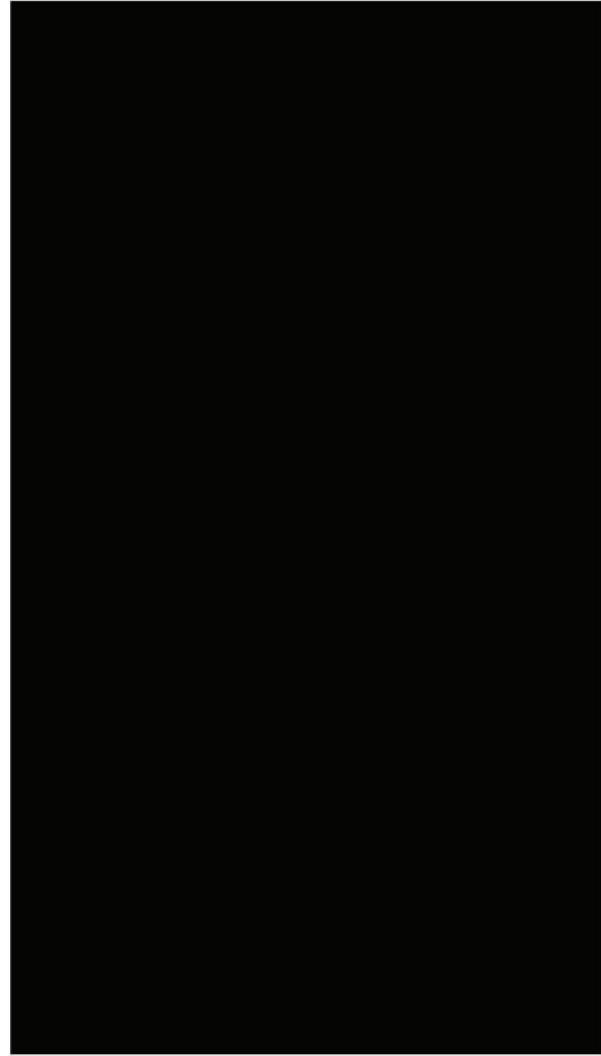
©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

15

WAGMDL00256687

## Video Training 2



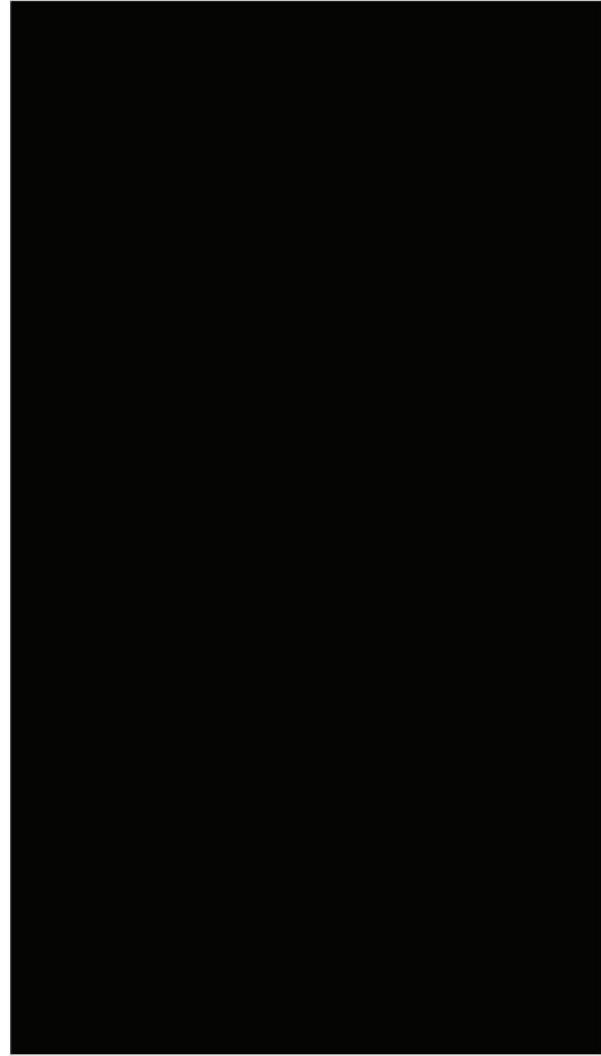
©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

16

WAGMDL00256688

## Video Training 3



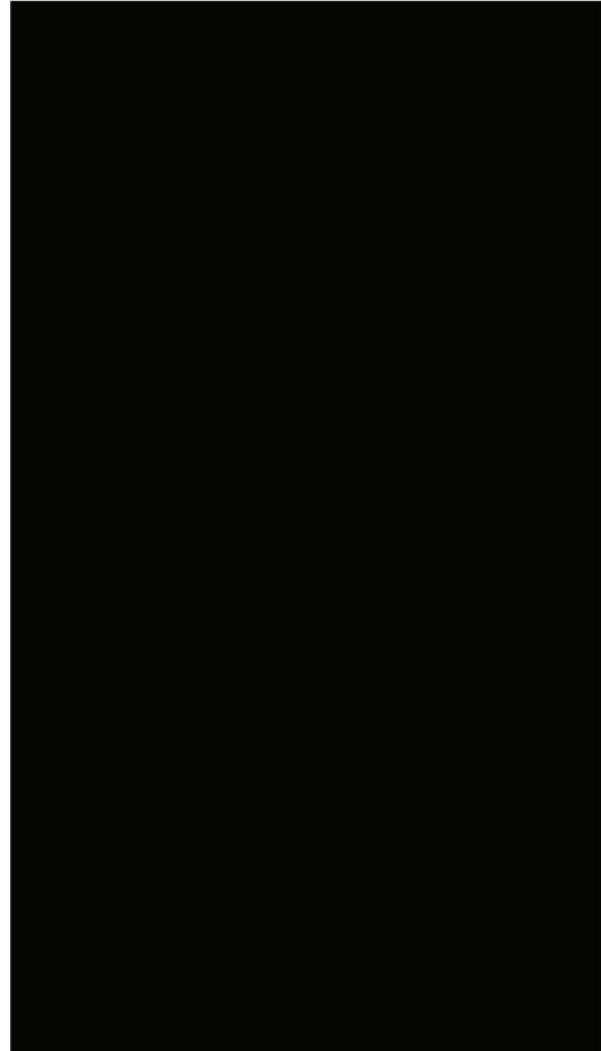
©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

17

WAGMDL00256689

## Video Training 4

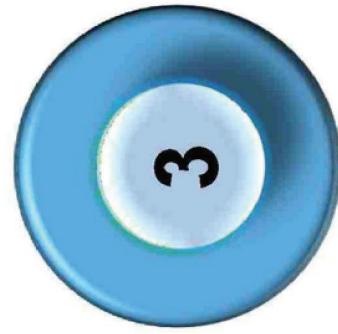


©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

## Case Study

- In your groups, review the case study.
- Determine what you would do as a pharmacist in the situation and how you might respond to the customer.
- You have 3 minutes
- At the end of the 3 minutes, be prepared to share your answers.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

WAGMDL00256691

## Case Study #1

A caregiver presents to the pharmacy a prescription for his wife from her oncologist/cancer center. The pharmacist tells the caregiver she will not fill it because she is unable to reach the prescriber to confirm the prescription since the prescriber's office is closed. The pharmacist tells the patient to come back tomorrow.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

## Case Study #2

A patient presents to the pharmacy two controlled substance prescriptions. Both are short acting opiates. The patient has no history of long acting medications to treat pain. Diagnosis is for lower back pain.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

## Case Study #3

A patient presents a prescription for Suboxone 8-2mg film for 4 films/day. The prescription is from a local Suboxone clinic and this is the first time this patient is presenting this prescription to your pharmacy.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

## Case Study #4

A student attends the university near your pharmacy and presents a prescription for Vyvanse 50mg daily. Your pharmacy fills various amphetamine prescriptions from the college students at this nearby campus.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

23

WAGMDL00256695

P-19616\_00

## Case Study #5

A patient presents two prescriptions for Oxycodone/Apap 10-325mg, and Carisoprodol 350mg. You notice the profile also shows he had just picked up a prescription for Alprazolam 2mg last week which the patient refills regularly every month. Upon reviewing PMP, you note the patient has been on all three medications for the past year.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

**Thank You**

HIGHLY CONFIDENTIAL

WAGMDL00256697

P-19616 \_ 00

# Appendix

HIGHLY CONFIDENTIAL

WAGMDL00256698

P-19616 \_ 00



## Talking Points When Refusing to Fill a Prescription

### SAY:

"Walgreens is working hard to ensure the safe dispensing of controlled pain medications. Based on my clinical review and professional judgment, this prescription does not meet the requirements Walgreens has put in place for dispensing these medications. Therefore, we cannot fill this prescription

### If a Patient Questions a Delay

### SAY:

"I'm sorry, but Walgreens is working hard to ensure our patients get the medications they need, but also that we do everything we can to help reduce the abuse of controlled pain medications. As a result, we have to take a bit more time with each prescription."

"I apologize for the inconvenience, but the time we take to review each prescription is a necessary to ensure we are meeting our commitment for the safe dispensing of medications to our patients."

**Important Note:** There are legitimate reasons why customers might need these products. Remember, most prescriptions for these medications will be for legitimate medical conditions and not used for diversion. Please apologize for the delay and help the patient understand why we have to comply with the verification procedures.





## Case Study #1

A caregiver presents to the pharmacy a prescription for his wife from her oncologist/cancer center. The pharmacist tells the caregiver she will not fill it because she is unable to reach the prescriber to confirm the prescription since the prescriber's office is closed. The pharmacist tells the patient to come back tomorrow.

- What would you do if you were the pharmacist in this situation?
- What would you say?





## Case Study #2

A patient presents to the pharmacy two controlled substance prescriptions. Both are short acting opiates. The patient has no history of long acting medications to treat pain. Diagnosis is for lower back pain.

What would you do if you were the pharmacist in this situation?





## Case Study #3

A patient presents a prescription for Suboxone 8-2mg film for 4 films/day. The prescription is from a local Suboxone clinic and this is the first time this patient is presenting this prescription to your pharmacy.

What would you do if you were the pharmacist in this situation?





## Case Study #4

A student attends the university near your pharmacy and presents a prescription for Vyvanse 50mg daily. Your pharmacy fills various amphetamine prescriptions from the college students at this nearby campus.

What would you do if you were the pharmacist in this situation?





## Case Study #5

A patient presents two prescriptions for Oxycodone/Apap 10-325mg, and Carisoprodol 350mg. You notice the profile also shows he had just picked up a prescription for Alprazolam 2mg last week which the patient refills regularly every month. Upon reviewing PMP, you note the patient has been on all three medications for the past year.

What would you do if you were the pharmacist in this situation?





# Pharmacist GFD Review Coaching Opportunities

## Pharmaceutical Integrity Team

April 2013

**Walgreens**

AT THE CORNER OF **HAPPY & HEALTHY**

©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

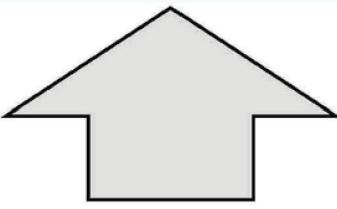
WAGMDL00256710

P-19616 \_ 00

# Agenda

## Topics:

- Review select Pharmacists specific to district/market with GFD opportunities
- Review controlled substance validation procedures
- Case Studies
- Review controlled substance prescription examples with the pharmacist



## Intended Outcomes:

- Identify opportunities for improvement specific to a pharmacist by reviewing potential issues in controlled substance dispensing
- Reiterate the GFD and TD GFD Validation Procedure

## Why are we doing this?

- To better assist supervision in evaluating overall GFD and controlled substance dispensing by reviewing prescriptions filled by select pharmacists.
- To provide a framework for the RXS to review controlled substance dispensing in our stores. This process is intended to assist pharmacists and assess, as well support, their exercise of professional judgment while carrying out their corresponding responsibility under the law.
- Pharmacists were selected based on dispensing patterns in 5 or more categories including Oxycodone, Hydromorphone, Methadone, Soma, Hydrocodone, CII's, and All Controls



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

## What if a prescription example I review with my pharmacist fits within the guidelines of Good Faith Dispensing?

District and market leadership store visits reinforce GFD. The Pharmacist GFD Tool was designed to assist leadership in having discussions with pharmacists around good faith dispensing.

Certain prescription examples may appear to fit within the confines of GFD practice. Look for documentation to support the pharmacist's TD/GFD decision.

The decision to dispense a prescription is ultimately up to the pharmacist, however, proper documentation to support the decision is needed. It is important that pharmacists document all actions taken during GFD process.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

# Coaching Opportunities

HIGHLY CONFIDENTIAL

WAGMDL00256714

## Review: Validation Process for Controlled Substances

Pharmacists should consider all available resources that can assist them in determining the appropriateness of filling a controlled substance prescription. This may include:

- Referencing the state Prescription Drug Monitoring Program website (in states where this is available)
- Reviewing the patient's profile
- Conversation with patient or caregiver
- Considering information from other pharmacists in the community (if indicated).
- Identifying prescriber trends
- Conversation with prescriber or clinical staff as needed

There are 3 key lenses through which a prescription should be evaluated when a pharmacist is presented with a controlled substance prescription.

1. Prescriber
2. Individual/Patient
3. Prescription



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

## Prescriber Considerations

1. Prescription is written by a prescriber located outside of the pharmacy's trade area.
2. Prescriber routinely prescribes large number (or percentage) of prescriptions for controlled substances relative to prescriptions for non-controlled substances.
3. Prescriber prescribes the same medication, with the same directions, for the same quantity for a large number of individuals.
4. Prescriber provides the same diagnosis for the majority of individuals.
5. Prescriber commonly writes narcotic prescriptions for individuals between 18-35 years old, especially chronic therapy.
6. Knowledge that prescriber operates on a "cash only" basis - does not accept insurance.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

## Individual/Patient Considerations

1. Individual **pays cash, or insists paying cash for controlled substances even though insurance is on file.**
2. Evidence of “**doctor shopping**” exists.
3. Evidence of “**pharmacy shopping**” exists.
4. Individual **resides outside of the trade area of your pharmacy (cannot be reasonably explained)**
5. The individual’s statement and conduct or behavior suggest abuse of controlled substances.
6. Individual routinely attempts to obtain an early refill on controlled substances.
7. Individuals have suspicious relationships with each other.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

## Prescription Considerations

1. Prescriptions presented represent a cocktail of commonly abused drugs.
2. Prescriptions presented is for an unusually large quantity or high starting dose.
3. Individual insists on the brand name, or a certain generic company's drug being dispensed.
4. Prescriptions appear to be altered or duplicated.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

# Prescription Review

HIGHLY CONFIDENTIAL

WAGMDL00256719

P-19616 \_ 00

# Prescription Selection

## Criteria:

1. High dose controlled substance
2. High quantity Oxycodone
3. High quantity Methadone
4. High quantity Hydrocodone
5. Cocktails such as an Opiate or Hydrocodone, Benzodiazepine and Carisoprodol
6. New patients with a high quantity control substance paying cash



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

11

WAGMDL00256720

P-19616\_00

## Case Studies

### Case Study 1

Carisoprodol 350mg Sig:18 PO Q Day Qty: 540 Refills:3



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

12

WAGMDL00256721

## Case Studies

Case Study 2  
Hydrocodone 10/325mg Sig:1 PO QID PRN Qty:120  
Carisoprodol 350mg Sig:1 PO Q 6hrs Qty:100  
Alprazolam 05.mg Sig: 1 PO BID PRN for anxiety Qty: 30

©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

## Case Studies

### Case Study 3

Oxycontin 80mg Sig:5-8 tabs PO Q 3-4 hrs Qty: 720

Oxycontin 40mg Sig: 2-3 tabs PO Q 4-6 hrs Qty: 400

Oxycodone 30mg Sig: 3-4 tabs PO Q 4-6 hrs Qty: 360



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

14

WAGMDL00256723

## Case Studies

### Case Study 4



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

15

WAGMDL00256724

## Talking Points

- Not all prescription examples are necessarily bad prescriptions.
- The decision whether to dispense or refuse may vary by pharmacist but should be reasonably explained.
- It's important to look for documentation that the pharmacist used the tools available as appropriate in the decision making process, such as the PDMR, reviewing the patient profile, or speaking with the patient or caregiver.



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

## Supporting Documents

- **GFD and TD GFD Policy posted on Storenet**
- **RX Integrity on Storenet**
- **CE's on Storenet/Learn/Continuing Education/Pain Management**



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

17

WAGMDL00256726

## Next Steps

- **Review and familiarize yourselves with:**
  - **Resources available on the RX Integrity website**
  - **Top pharmacists identified in your area**
  - **Prescription examples specific to your pharmacists**
  - **Patient, prescriber and prescription considerations**
- **Incorporate pharmacist coaching on controlled substances in your store visits**
- **Ensure all stores have a “refused” folder for controlled substances**
- **Communicate with your pharmacists**



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

# Questions?

- Pharmacy Supervisors can direct questions to the Divisional Rx Integrity Managers:
  - Christopher (Chris) Dymon - East
  - Patricia (Patty) Daugherty - Midwest
  - Edward (Ed) Bratton - South
  - Eric Stahmann - West
- Rx Integrity E-mail: ([rxintegrity@walgreens.com](mailto:rxintegrity@walgreens.com))

OR



©2013 Walgreen Co. All rights reserved. Confidential and proprietary information. For internal use only.

HIGHLY CONFIDENTIAL

**Thank You**

HIGHLY CONFIDENTIAL

WAGMDL00256729

P-19616 \_ 00